



Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods**

Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) (ADN Safety Committee)

Forty-third session

Geneva, 22-26 January 2024

Item 5 (b) of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN:
other proposals**

Proposal for an amendment of Table C for substances with CMR properties according to REACH**Transmitted by the Government of Belgium******Introduction**

1. The Belgian delegation asked the ADN Safety Committee during its forty-second session its opinion on how to deal with substances with carcinogenic, mutagenic or toxic to reproduction (CMR) properties listed in the European Union (EU) regulation on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) that are not yet incorporated into the ADN. It was suggested that the representative of Belgium presents information on these substances at the forty-third session for consideration by the ADN Safety Committee.

I. Problem description

2. When looking at certain substances in the central database of the European Chemicals Agency (ECHA), we discover that those substances have properties where a majority of data submitters indicate that the substance is carcinogenic, while in column (18) of Table C of Chapter 3.2, "TOX" is not indicated.

3. The Belgian delegation is of the opinion that the Regulations annexed to the ADN should be updated according to data available in the REACH database. Unfortunately, the

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** A/78/6 (Sect. 20), table 20.5



Belgian delegation was not able to look up every entry from Table C in the database, however, we have noticed at least two entries of UN No. 1086 which should be amended.

4. The Belgian delegation is aware of amendments in the database which may be introduced by data submitted by manufacturers to the REACH database. A new check-up may be necessary every time before a new version of the Regulations annexed to the ADN is released. Such check-up demands resources from the member states and is probably not very efficient. Moreover, UN numbers are not used in the database. Therefore, the Belgian delegation proposes to discuss the problem with the European Chemicals Agency and to inform the ADN Safety Committee accordingly.

II. Proposal for amendment

5. The Belgian delegation proposes to add “+ CMR” and “TOX” to entries of:

- UN No. 1086 VINYL CHLORIDE, STABILIZED and VINYL CHLORIDE, STABILIZED, REFRIGERATED

- UN No. 1089 ACETALDEHYDE (ethanal)

in columns (5) and (18) of Table C of Chapter 3.2, as follows (new text in bold and underlined):

Table C:

UN No. or substance identification No.	Name and description	Class	Classification code	Packing group	Dangers	Type of tank vessel	Cargo tank design	Cargo tank type	Cargo tank equipment	Opening pressure of the pressure relief valve/high in %	Relative density at 20 °C	Type of sampling device	Pump room below deck permitted	Temperature class	Explosion group	Anti-explosion protection required	Equipment required	Number of cones/blue lights	Additional requirements/Remarks	
(1)	(2)	(3a)	(3b)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
	3.1.2	2.2	2.2	2.1.1.3	5.2.2/ 3.2.3.1	1.2.1/ 7.2.2.0.1	3.2.3.1/ 1.2.1	3.2.3.1/ 1.2.1	3.2.3.1/ 1.2.1	7.2.4.21	3.2.3.1	3.2.3.1/ 1.2.1	3.2.3.1/ 1.2.1	1.2.1	1.2.1/ 3.2.3.3	1.2.1/ 3.2.3.3	8.1.5	7.2.5	3.2.3.1	
1086	VINYL CHLORIDE, STABILIZED	2	2F		2.1+unst. <u>+CMR</u>	G	1	1		91		1	no	T2 ¹²⁾	II A	yes	PP, EX, <u>TOX, A</u>	1	2; 3; 13; 31	
1086	VINYL CHLORIDE, STABILIZED, REFRIGERATED	2	3F		2.1+unst. <u>+CMR</u>	G	2	4	1; 3	95		1	no	T2 ¹²⁾	II A	yes	PP, EX, <u>TOX, A</u>	1	2; 3; 13; 31	
1089	ACETALDEHYDE (ethanal)	3	F1	I	3+N3 <u>+CMR</u>	C	1	1		95	0.78	1	yes	T4	II A	yes	PP, EX, <u>TOX, A</u>	1	35	

III. Justification

6. The Belgian delegation refers to the following Sustainable Development Goals:

Goal 3: Good health and well-being

In the case a certain substance is indicated to be carcinogenic the vessel should be equipped with a toximeter appropriate for the current and previous cargo, with the accessories and instructions for its use. The availability of this toximeter will have a positive impact on the health and personal safety of people involved in this operation as well as to people on board and in the vicinity of the tank vessel. At least the crew of the vessel will be informed they are dealing with a toxic substance which may be carcinogenic.

Goal 8: Decent work and economic growth

Herewith, a safer and more secure working environment will be achieved.

IV. Action to be taken

7. The ADN Safety Committee is invited to consider the proposed amendments in paragraph 5 above, and to take action as it deems appropriate.

8. The Belgian delegation is willing to discuss with ECHA a more efficient consultation of the database as explained in paragraph 4. The ADN Safety Committee will be informed afterwards.
